

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

December 18, 1997

Mr. Fred Austin,
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Notices of Violation No. 36565; 36566; 36567

Dear Mr. Austin:

Regarding the SO₂ emissions in the above NOV's which exceeded the 1 hour start up limit of 200 ppmc. The emissions were reported as occurring during the preheat phase of start up and should be exempt under WAC 173-400-107 (4) Excess emissions due to startup or shutdown. As explained in the CEM addendum, an emission can occasionally occur during the preheat phase of start up which is unavoidable since it is impossible to add sorbent to the system to affect control of SO₂.

The fact that the revised approval order #5730 and PSD 90-30 Amendment 1 includes a higher SO₂ limit for startup conditions does not nullify the terms of WAC 173-400-107. As PSAPCA is also aware, Ash Grove is currently evaluating the preheat phase of start up as part of a proposal (NOC 6708) to modify the appropriate SO₂ limits in the permit.

If Ash Grove can provide any information needed, please contact me as needed.

Yours truly,

Gerald J. Brown
Manager Safety and Environment

cc: Henrik Voldbaek

Registration No. 11339
Cert. Mail No. 233423300

NOTICE OF VIOLATION

No. **36565**
RECEIVED
DEC 17 1997
SEATTLE

Date of Violation: October 2, 1997

Name Ash Grove Cement Co.	Responsible Person, Title Henrik Voldback, Mgr		
Location of Violation (Address) 3801 E. Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address As above	City, State Seattle, WA	Zip 98134	Phone (206) 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 7

☐ Section During start up of the kiln, SO₂ emissions from the main stack
are not to exceed 200 ppm corrected to 10% O₂ 1 hr Average

FACTS ALLEGED TO CONSTITUTE A VIOLATION October 1997 CEM Report.

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

12/16/97
Date/Time

Received By: _____
Signing this Notice is not an admission of guilt

AGCS2M001169

PUGET SOUND AIR POLLUTION CONTROL AGENCY

Registration No. 11339

Cert. Mail No. 2334353500

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

NOTICE OF VIOLATION

Ind. 36566

Date of Violation: October 3

1997

RECEIVED

DEC 17 1997

AGCW-SEATTLE
MGR

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldback, Mgr</u>	
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>		City <u>Seattle</u>	Zip <u>98134</u>
Mailing Address <u>As Above</u>		City, State <u>Seattle, WA.</u>	Zip <u>98134</u>
		County <u>King</u>	Phone <u>(206) 623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
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- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 7

Section During start up of the kiln, SO₂ emissions from the main
stack are not to exceed 200 ppm corrected to 10% O₂ 1 hr. Average.

CTS ALLEGED TO CONSTITUTE A VIOLATION October 1997 CEM Report

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Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the
provisions, and take the following necessary corrective action:

Fel J. Duster

By: [Signature]
Air Pollution Inspector
10-119 (Revised 12/95 cbb)

12/16/97
Date/Time

Received By: _____

AGCS2M001170

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
Cert. Mail No. 2324-53500

No. **36567**

NOTICE OF VIOLATION

Date of Violation: October 10, 19 97

RECEIVED

Name <div style="font-size: 1.2em; font-family: cursive;">Ash Grove Cement Co.</div>	Responsible Person, Title <div style="font-size: 1.2em; font-family: cursive;">Henrik Voldback, Mgr</div>		
Location of Violation (Address) <div style="font-size: 1.2em; font-family: cursive;">3801 E. Marginal Way So.</div>	City <div style="font-size: 1.2em; font-family: cursive;">Seattle</div>	Zip <div style="font-size: 1.2em; font-family: cursive;">98134</div>	County <div style="font-size: 1.2em; font-family: cursive;">King</div>
	Mailing Address <div style="font-size: 1.2em; font-family: cursive;">As Above</div>	City, State <div style="font-size: 1.2em; font-family: cursive;">Seattle, WA.</div>	Zip <div style="font-size: 1.2em; font-family: cursive;">98134</div>

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REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

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- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 7
- ☐ Section During start up of the kiln, so emissions from the main stack
are not to exceed 200 ppm corrected to 10% O₂ 1 hr. Average.
- ☐ Section _____

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Issued By:

Air Pollution Inspector

12/16/97

Date/Time

Received By: _____

Signing this Notice is not an admission of guilt
AGCS2M001171

Form No. 70-119 (Revised 12/95 cbc)